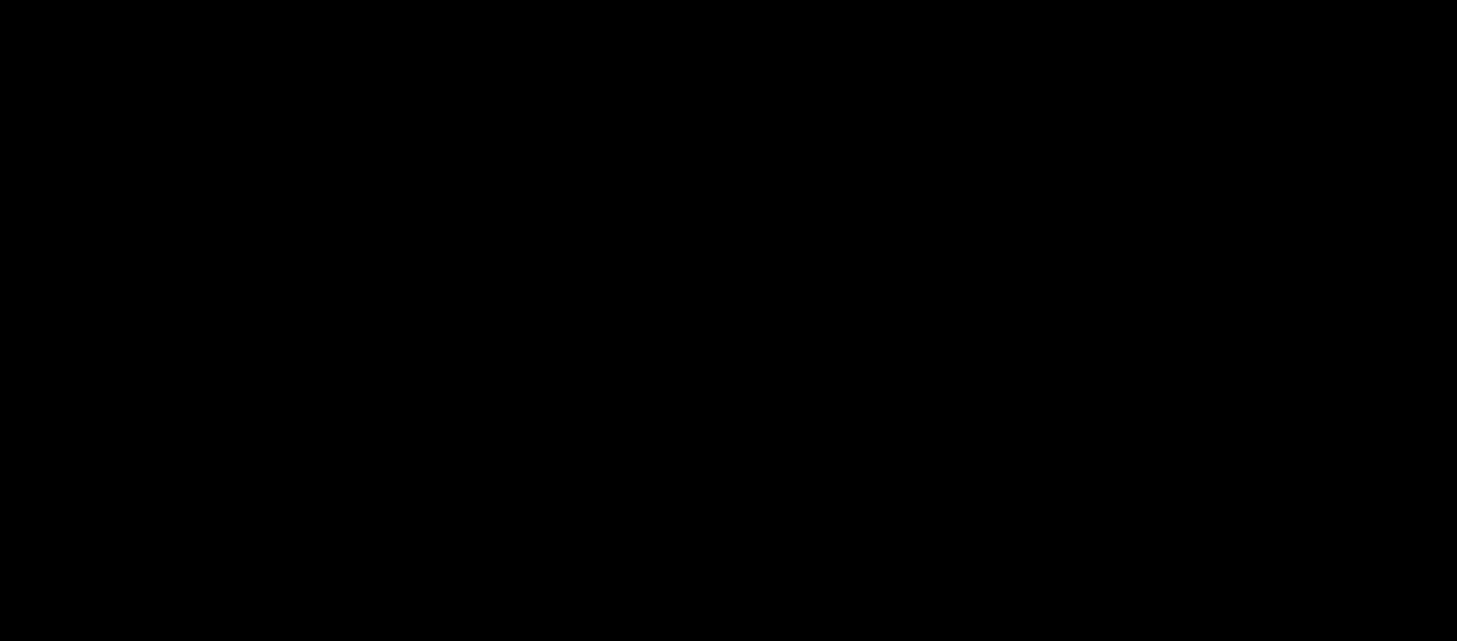


# **EXHIBIT B**



**From:** Charles Teale <cteale@tealelaw.com>  
**Sent:** Thursday, October 31, 2019 7:09 PM  
**To:** John A. Curran <Curran@gcglaw.com>  
**Subject:** Re: MURPHY, Shawn

Hi John,

Please see *attached*. A hard copy of the same with the medical bills and records is being mailed to your attention today.

I realize this gives you very little time for review, and no time to get settlement approval. Are you interested in a tolling agreement?

Charles C. Teale, Esq (#19888)  
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**From:** John A. Curran <Curran@gcglaw.com>  
**Sent:** Tuesday, October 15, 2019 6:35 PM  
**To:** Charles Teale <cteale@tealelaw.com>  
**Subject:** RE: MURPHY, Shawn

Charles: Had a case pull me out of the office and then was traveling last week and part of this week, if we need to touch base again or anything else you are still seeking, please let

me know. Send me along demand and cases and I will, of course, share with my folks. I understand your view of the case and appreciate the email, thx, JOHN

**John A. Curran, Esq.**

Dir: 603.545.3656

Gen: 603.228.1181

Fax: 603.224-7588

Email: [curran@gcglaw.com](mailto:curran@gcglaw.com)

---

**From:** Charles Teale <cteale@tealelaw.com>

**Sent:** Thursday, September 26, 2019 6:33 PM

**To:** John A. Curran <Curran@gcglaw.com>

**Subject:** Re: MURPHY, Shawn

Understood on my end as well. My co-counsel on the case is Robert Fojo. If he contacts you for anything you are able to discuss everything with him. I'm not going to waste much time in pre-suit discussions if your client is not serious about settling the matter. Our demand will include myriad federal cases that are on point. At the end of the day, Shawn was a prisoner requesting mental health treatment, he was non-violent, yet was pounced on by five (+) officers, pepper sprayed, tased in the BACK, and had his leg broken. There needs to be accountability. We will be filing in Federal Court prior to 11/16/19 if the case does not settle.

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**From:** John A. Curran <[Curran@gcglaw.com](mailto:Curran@gcglaw.com)>

**Sent:** Thursday, September 26, 2019 6:13 PM

**To:** Charles Teale <[cteale@tealelaw.com](mailto:cteale@tealelaw.com)>

**Subject:** RE: MURPHY, Shawn

9/26: Understood; may only be in for a half day tomorrow, but will try to review and get back to you. Happy to receive your demand, but can make no representations on a response or pre-suit mediation potential. These cases are generally handled very differently than run of the mill litigation, but I am always willing to keep a dialogue open, irrespective. Thank you, Charles, JOHN

**John A. Curran, Esq.**

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Email: [curran@gcglaw.com](mailto:curran@gcglaw.com)

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**From:** Charles Teale <[cteale@tealelaw.com](mailto:cteale@tealelaw.com)>  
**Sent:** Thursday, September 26, 2019 5:46 PM  
**To:** John A. Curran <[Curran@gcglaw.com](mailto:Curran@gcglaw.com)>  
**Subject:** Re: MURPHY, Shawn

That works. I have a looming SOL deadline. I have obtained almost all medical bills and records necessary. I should be able to get you a comprehensive demand in the coming weeks. I am keenly interested in any other reports (particularly narrative reports) that may exist.

I do think it makes some sense to schedule a pre-suite mediation for some time in late October just in case we can't get this settled on our own. Thoughts?

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**From:** John A. Curran <[Curran@gcglaw.com](mailto:Curran@gcglaw.com)>  
**Sent:** Thursday, September 26, 2019 5:42 PM  
**To:** Charles Teale <[cteale@tealelaw.com](mailto:cteale@tealelaw.com)>  
**Subject:** RE: MURPHY, Shawn

9/26: Charles: has been a little bit of time, so let me try to pull the case file tomorrow, inquire of my client if necessary and get back to you, if acceptable on your end?  
Hope you are well, thx, JOHN

**John A. Curran, Esq.**  
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**Email:** [curran@gcglaw.com](mailto:curran@gcglaw.com)

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**From:** Charles Teale <[cteale@tealelaw.com](mailto:cteale@tealelaw.com)>  
**Sent:** Thursday, September 26, 2019 5:09 PM  
**To:** John A. Curran <[Curran@gcglaw.com](mailto:Curran@gcglaw.com)>  
**Subject:** Re: MURPHY, Shawn

Hi John,

In your April 19, 2019 letter to me you advised, "With regard to the allegation that officers employed a Taser on your client after he was secured in handcuffs, that is simply not the case". Am I to understand that he was Tased prior to the handcuffs being placed on him?

being placed on him:

Is the DOC Disciplinary Board Form that is *attached* the only report from the DOC or CO's regarding this incident? Shouldn't there be a Use-Of-Force report or the like?

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**From:** Charles Teale  
**Sent:** Friday, August 9, 2019 10:16 AM  
**To:** John A. Curran <[Curran@gcglaw.com](mailto:Curran@gcglaw.com)>  
**Subject:** Re: MURPHY, Shawn

My pleasure. Have a great weekend!

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**From:** John A. Curran <[Curran@gcglaw.com](mailto:Curran@gcglaw.com)>  
**Sent:** Friday, August 9, 2019 9:52:44 AM  
**To:** Charles Teale <[cteale@tealelaw.com](mailto:cteale@tealelaw.com)>  
**Subject:** RE: MURPHY, Shawn

8/9/19: OK, Charles, thanks for the update and timetable. John

**John A. Curran, Esq.**  
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Gen: 603.228.1181  
Fax: 603.224-7588  
Email: [curran@gcglaw.com](mailto:curran@gcglaw.com)

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**From:** Charles Teale <[cteale@tealelaw.com](mailto:cteale@tealelaw.com)>  
**Sent:** Friday, August 9, 2019 9:41 AM  
**To:** John A. Curran <[Curran@gcglaw.com](mailto:Curran@gcglaw.com)>  
**Subject:** Re: MURPHY, Shawn

Hi John,

Just an FYI, I am still in the process of collecting Sean's medical bills and records. I should be able to have them out to you with a settlement demand in the next 30-60 days...

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**From:** John A. Curran <[Curran@gcglaw.com](mailto:Curran@gcglaw.com)>  
**Sent:** Thursday, May 2, 2019 12:37 PM  
**To:** Charles Teale <[cteale@tealelaw.com](mailto:cteale@tealelaw.com)>  
**Subject:** MURPHY, Shawn

Charles: a pdf/email copy of letter out to you today, thx JOHN

**John A. Curran, Esq.**  
Dir: 603.545.3656  
Gen: 603.228.1181  
Fax: 603.224-7588  
Email: [curran@gcglaw.com](mailto:curran@gcglaw.com)

**From:** [2ndFICopyRm2@gcglaw.com](mailto:2ndFICopyRm2@gcglaw.com) <[2ndFICopyRm2@gcglaw.com](mailto:2ndFICopyRm2@gcglaw.com)>  
**Sent:** Thursday, May 2, 2019 11:37 AM  
**To:** John A. Curran <[Curran@gcglaw.com](mailto:Curran@gcglaw.com)>  
**Subject:** Message from KM\_458



2019-10-16  
Letter t...ran.pdf